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inois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

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fer to: 0316550004 -- Cook County
Chicago/PVS Chemicals, Inc. (Illinois)
ILD001833714
Closure Log C-138

September 1, 1987

PVS Chemicals, Inc. (Illinois)
Attention: Dale S. Smyser
12260 South Carondolet Avenue
Chicago, Illinois 60633

Dear Mr. Smyser:

This letter is in response to your July 14, 1987 submittal that provided the Agency with soil and wastewater sample results related to lead contamination in and around the surface impoundments at the subject facility.

We have reviewed that submittal and offer the following comments:

1. The eleven (11) composite soil samples taken outside of the south impoundment within twenty (20) feet of the berm all indicate detectable EP Toxic levels of lead with the exception of Sample #3. Samples #7, #9 and #11 exhibit EP Toxic lead values of 72.2 mg/l, 6.92 mg/l and 7.45 mg/l, respectively. The remaining samples' EP Toxic lead values ranged from 0.08 mg/l to 2.98 mg/l, with a simple arithmetic mean of 0.68 mg/l for those seven (7) samples. Therefore, three (3) of the eleven (11) composite soil sample values exceed the RCRA hazardous waste characteristic value of 5.0 mg/l EP Toxicity. In addition, the remaining seven (7) sample values above the 0.05 mg/l detection limit are at levels that the Agency feels need further investigation.

   In an August 28, 1987, telephone conversation with Mr. Charlie Zeal of my staff, you indicated that the source of lead contamination outside of the impoundments might be attributed to the on-site storage and dismantling of production equipment constructed primarily of lead. You also indicated that as part of the on-site equipment dismantling process that some of the scrap lead was melted and formed into lead ingots. If PVS Chemicals still wishes to pursue the contention that lead contamination outside of the impoundments is not a result of the operation of the impoundments, additional information regarding the extent and degree of lead contamination across the entire site should be developed, including the determination of a representative background value for lead in soil at an uncontaminated location on the site. Soil pH values should also be determined at each soil sample location.

2. The closure plan as approved by our March 4, 1986 approval letter is still the applicable closure document for the surface impoundment (S04) and tank treatment (T01) units. Since the impoundments did receive waste which was RCRA hazardous due to the characteristic of corrosivity (D002) up until November of 1981, the impoundments must still proceed through the closure process as proposed. This being the case, please be advised that the closure certification due date is August 4, 1986. To rectify this situation, a closure plan modification request must be submitted to the Agency no later than November 6, 1987 that requests an extension for the closure certification due date taking into account the time required to complete the activities necessary to close the surface impoundment and tank treatment units in accordance with the approved closure plan, and demonstrate the degree, extent and source(s) of lead contamination outside the limits of the surface impoundments.

If you should have any questions concerning this letter, please contact Charlie Zeal at 217/782-6762.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

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cc: Division File, Closure
Maywood Region
Compliance Monitoring Unit
Bob Carson
USEPA Region V, Jim Mayka
USEPA Region V, Jonathan Adenuga
Stephen Davis